

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 03-60

Respondent: John Conroy / John White
Title: Vice President / Exec. Director

REQUEST: Attorney General Set #1

DATED: November 21, 2003

ITEM: AG Set 1-1 Please provide a list of all Verizon-MA wire centers showing the corresponding MSA and density zone assignments that you used in your trigger analysis as described in Attachments 1, 2 and 3 to the Initial Panel Testimony of Messrs. Conroy and White filed November 14, 2003, regarding mass market switching, transport and loops (“Triggers Testimony”).

REPLY: Attachment 1 to Verizon MA’s testimony does not depict MSAs, density zones, or wire centers. It simply shows the locations of switches (circuit, remote, packet, and soft) deployed by CLECs in Massachusetts. With respect to Attachments 2 and 3, the MSA and density zone assignments for individual Verizon wire centers are set forth in the Attachment to this response. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department’s Protective Order.

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ITEM: AG Set 1-2 Please produce the E911 study and the Line Count Study and all associated work papers, analysis and backup work referenced on page 18 of the Triggers Testimony. Please provide the Excel worksheet associated with the Line Count Study.

REPLY: Attached are the E911 and the Line Count studies. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.

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ITEM: AG Set 1-3 If the Company has done any reconciliation or reasonableness check comparing the universe of E911 lines to known line sources (cable, Verizon retail, Verizon wholesale, residence and business subtotal checks, etc.), please provide the workpapers and summaries associated with the analysis or analyses. If Verizon has not undertaken these reasonableness checks, please explain why not.

REPLY: Verizon did not analyze the “universe” of E911 lines for the triggers. Instead, Verizon *only* used E911 data to locate *residential* customers of cable telephony providers that completely bypass Verizon’s network in Massachusetts. The count of “known line sources” cited above would not “reconcile” with nor have any bearing on the reasonableness of the small subset of residential E911 listings that Verizon considered in its analysis.

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ITEM: AG Set 1-4 Please reconcile Verizon's statements regarding deployment by city/town of cable telephony on page 20 of the Triggers Testimony with your position on page 12 of the Triggers Testimony stating that CLECs do not enter the mass market at the wire center level.

REPLY: Verizon's testimony did not state, or even imply, that cable telephony providers "deploy[] by city/town," let alone that they deploy service on an individual wire center basis. Rather, Verizon simply pointed out that Comcast is currently providing service "in over 120 Massachusetts cities and towns" without implying that the initial cable deployment decisions made by AT&T Broadband prior to its acquisition by Comcast were made on the basis of individual cities and towns, let alone individual wire centers. To the contrary, in the AT&T Broadband presentation cited in the testimony, AT&T Broadband described its deployment of cable telephony in Boston at the "designated market area" or "DMA" level. DMAs are similar in size to Metropolitan Statistical Areas, *i.e.*, they span multiple wire centers. Moreover, cable telephony providers bypass Verizon's network completely and thus Verizon's wire center boundaries – which are an artifact of Verizon's network deployment decisions, nor market characteristics – are completely irrelevant to the deployment of cable telephony.

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ITEM: AG Set 1-5 Please provide Verizon's assumption regarding which wire center(s), MSA and density zone assignments each of the CLEC switches listed on page 16 of the Triggers Testimony applies to.

REPLY: Verizon made no such assumptions. The relevant issue for the triggers case is the location of mass market customers served using CLEC self-deployed switches; the physical location of particular switches is not important. Therefore, Verizon did not try to "assign" particular switches to particular MSAs or density zones. Nor would doing so be appropriate, since as Verizon pointed out in its testimony, "a single switch can serve an entire LATA or state, or multiple LATAs or states." Testimony at 17.

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ITEM: AG Set 1-6 Can UNE-Loops be used by CLECs to provide services other than voice-grade access line service? If the answer is yes, please name all of the potential services.

REPLY: Yes, UNE loops come in several different varieties. For example, CLECs can order UNE loops at the DS-1 or DS-3 level for the provision of both voice and data services. In addition, CLECs can order loops conditioned for xDSL service. However, Verizon did not count these types of loops in its line count study for the purposes of the mass market switching trigger analysis.

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ITEM: AG Set 1-7 Please provide the number of Verizon's residential second lines on a monthly basis by wire center for the period 1/1/01 through the latest month available. Please provide any analysis (either ongoing explanations or stand-alone studies) that Verizon has undertaken to explain the reasons for monthly changes (i.e. new growth, losses to cable, losses to CLECs, losses to economy etc.). Please provide the number of total residential lines for the same period of time and at the same level of detail.

REPLY: Verizon objects to this request on the grounds that the question is overly broad, asks for information that is not relevant to the triggers analysis at issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, developing the data as requested would require that Verizon conduct a burdensome special study.

Notwithstanding its objection, Verizon states that the information requested concerning residential second lines is not available. The spreadsheet attached hereto provides the number of total Verizon MA residential lines as of June 2003. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.

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ITEM: AG Set 1-8 Please refer to pages 24-27 of the Triggers Testimony in which the Panel members assert that Verizon's trigger analysis undercounts the number of customers served by competitive switches. Is it Verizon's position that the number of end user customers is critical to the trigger analysis? If this is Verizon's position, please cite the relevant TRO sections.

REPLY: No. The number of end user customers served by a particular CLEC within the relevant market is not relevant to the trigger analysis. However, if there are customers being served by a CLEC within a particular market, and Verizon is unable to identify those customers, Verizon may undercount the total number of CLECs that are serving mass market customers within the relevant market using their own switches.

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ITEM: AG Set 1-9 Please provide copies of the following documents referenced in Attachment 7 of the Triggers Testimony:

- a. Target inspection list as of 6-26-03 (item 1).
- b. All inspection worksheets as they were received from the field.
- c. The final copies and summary copies of all inspection worksheets. Please explain any differences between the original and the final copies.

REPLY:

- a. Please see Attachment A. The attachment contains CLEC proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.
- b. Please see Attachment B, which contains all inspection information for the state of Massachusetts as received from the inspectors. The attachment contains CLEC proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.
- c. Please see the response and attachment to subpart b above.

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ITEM: AG Set 1-10 Please provide the relevant background/experience of each individual Collocation inspector who participated in collecting data sought by Attachment 7.

REPLY: All collocation inspectors in Massachusetts hold the title of Network Engineer. A Network Engineer is responsible for all aspects of central office engineering, which includes all aspects of collocation.

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ITEM: AG Set 1-11 Regarding Attachment 7, items 3.1.11 and 3.1.12, please explain the process followed when the “attempt” was unsuccessful. Please identify which attempts were successful by wire center.

REPLY: Regarding item 3.1.11, there were very few cases in which an inspector was not able to trace the CLEC fiber to a vault location. The spreadsheet provided in response to subpart (b) question 9, has a column labeled “untraceable.” If this column has a “Y,” the inspector was not able to trace the CLEC fiber to the vault location.

Regarding item 3.1.12, there was no follow-up to an unsuccessful attempt. As the document states, the inspector verified with local management that the CLEC was a known fiber-based collocater.

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ITEM: AG Set 1-12 Regarding Attachment 7, please explain how step 4.1.8 was carried out. What would make the equipment “appear” to be in service? What tests were done to check for power at the CLEC’s equipment?

REPLY: This information is contained on page four of Attachment 7 (third paragraph).

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ITEM: AG Set 1-13 Would Column P be checked in Attachment 7, step 4.1.9, if the equipment had LED indicators on but the equipment was not connected to any circuits?

REPLY: Yes, the collocation arrangement would be correctly recorded as operational.

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ITEM: AG Set 1-14

- a. How would an inspector distinguish between Verizon and non-Verizon fiber cable in Attachment 7, step 4.1.10?
- b. Please describe the appearance of cable terminated to equipment in the collocater's space.
- c. Did the inspector have access to the cage?
- d. If the connection was out of the line of sight of the inspector, how would they know whether it was connected or not?

REPLY:

- a. The inspector would have identified a tag affixed to the fiber cable which is used to identify ownership.
- b. Please see page 4 of the inspection methods.
- c. No, the inspector did not have access to the cage.
- d. In this hypothetical, the inspector would not be able to determine if the fiber was connected inside the cage. However, if the collocation arrangement was operational and the fiber leaving the arrangement was traced to the central office vault, it would be assumed that the fiber was connected inside the collocation arrangement so that the CLEC could use the fiber.

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ITEM: AG Set 1-15 What training did Verizon provide to the inspectors for collecting the data for Attachment 7 beyond the written procedures supplied with the Triggers Testimony?

REPLY: Given an inspector's job functions and responsibilities (see response to question 10) and knowledge of collocation functionality, no additional training was required.

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ITEM: AG Set 1-16 Please provide the statistical analysis supporting the last statement on the Attachment 7, page 4, authored by J. D. Lippa. Please identify J.D. Lippa's title and work responsibilities within Verizon.

REPLY: This statement was not based upon a statistical analysis. Mr. Lippa is a Senior Engineer in the Network Engineering organization.

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ITEM: AG Set 1-17 Please produce copies of the New Paradigm CLEC Report pages that the Company cites in its Triggers Testimony, including references on pages 26, 44 and 45. Please indicate whether the Report pages are part of the 2003 edition or a previous edition.

REPLY: The reports published by New Paradigm Resources Group and referenced at page 26 and pages 44-45 of Verizon MA's Switching and Transport Panel Testimony are copyrighted materials. Accordingly, Verizon MA is not permitted to produce duplicate copies. Copies of the reports are available for review at Verizon Massachusetts' premises. Footnote 23 of Verizon MA's testimony provides a cite to the New Paradigm Resources Group, Inc.'s, 2001 Competitive IOC Report that was referenced on page 26 of Verizon MA's testimony. The full cite to the report referenced on pages 44-45 of Verizon's testimony follows: CLEC Report 2003™ – Competitive Last Mile Providers, ©2003, New Paradigm Resources Group, Inc., Chicago, IL. New Paradigm Resources Group, Inc. can be reached at (312)980-7848 or www.nprg.com.

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ITEM: AG Set 1-18 Referring to pages 45-46 and Attachment 8 of the Trigger Testimony, please state whether, in preparing your testimony, you have reviewed any responses from wholesale transporters, including AboveNet/MFN, NEON Communications, Inc., Qwest, and Williams Local Network, to Department-issued subpoenas in this docket as to:

- a. Whether these companies are willing to sell all specific capacities or dark fiber to other carriers on all transport routes;
- b. The identity of the transport routes that these companies have chosen not to sell all specific capacities or dark fiber to other carriers;
- c. Whether these companies are willing to sell DS1 and DS3 transport over all their fiber facilities, as well as dark fiber; and
- d. Which companies operate fiber rings in MA.

REPLY: In preparing the filed testimony, Verizon had not yet reviewed or analyzed the responses to the Department's information requests. Moreover, to the best of our knowledge, Verizon MA has not yet received responses to the Department's data requests from AboveNet/MFN, NEON Communications, or Qwest. Verizon has received responses from WilTel Local Networks but not Williams Local Network.